

**Exhibit “A”**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re

WYNNE TRANSPORTATION HOLDINGS,  
LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 7

Case No. 25-10027 (KBO)

(Jointly Administered)

**AFFIDAVIT OF JASON C. MANFREY, ESQUIRE**

COMMONWEALTH OF PENNSYLVANIA :

: SS

MONTGOMERY COUNTY :

:

JASON C. MANFREY, being duly sworn according to law, deposes and says:

1. I am a shareholder of the law firm Stevens & Lee PC ("Stevens & Lee"), with offices located at 620 Freedom Business Center, Suite 200, King of Prussia, PA 19406, and I am admitted to practice law in the Commonwealth of Pennsylvania and in the State of New Jersey. Unless otherwise stated in this Affidavit (the "Affidavit"), I have personal knowledge of the facts set forth herein, or knowledge of such facts based upon the information contained in the books and records of Stevens & Lee.

2. This Affidavit is being submitted in support of the Motion (the "Motion") of Alfred T. Giuliano (the "Trustee"), the chapter 7 trustee for the estates of Wynne Transportation Holdings, LLC, *et al.* (the "Debtors"), for entry of an order, pursuant to 11 U.S.C. §§ 327(a) and 328(a), Fed. R. Bankr. P. 2014 and Del. Bankr. L.R. 2014-1, authorizing the employment and

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<sup>1</sup> The Debtors in these chapter 7 cases, along with the last four digits of each Debtors' federal tax identification number, are: Wynne Transportation Holdings, LLC (0566), Wynne Transportation, LLC (8255), Coastal Crew Change Company, LLC (9550), WTH Commercial Services, LLC (9379), Southwest Crew Change Company, LLC (8777), Great Plains Crew Change Company, LLC (5926), and Allegheny Crew Change Company, LLC (9234). The Debtors' address is 14110 N. Dallas Parkway, Suite 240, Dallas, Texas 75254.

retention of Stevens & Lee, as attorneys to the Trustee, in these cases effective as of February 28, 2025.

3. To the best of my knowledge and except as disclosed herein, Stevens & Lee is not aware of any conflict of interest in connection with its representation of the Trustee in these cases.

4. Stevens & Lee maintains a computerized database which contains, inter alia, (1) all present and former clients of Stevens & Lee, (2) the names of the parties who are or were related or adverse to such client, and (3) the names of Stevens & Lee personnel who are or were responsible for the matters. I have caused the database to be searched and compared to the names of the persons and entities listed on Schedule A to this Affidavit to determine whether Stevens & Lee may have a potential conflict or connection with the persons or entities listed therein (collectively, the “Interested Parties”).

5. Based on the results of Stevens & Lee’s search of its database, it appears that Stevens & Lee does not hold or represent any interest adverse to and has no connection, subject to the disclosures set forth below, with the Interested Parties, including the Debtors, the creditors, the U.S. Trustee, any person employed in the Office of the United States Trustee, and the U.S. Bankruptcy Court for the District of Delaware, and is a “disinterested person” within the meaning of section 101(14) of the Bankruptcy Code, and disclosed herein as follows:

a. None.

6. Stevens & Lee may have in the past represented, may currently represent, and may in the future represent, certain entities that are claimants or potential claimants of the Debtors, or other parties in interest, in matters wholly unrelated to the Debtors and these chapter 7 cases. Except as set forth herein, I am not aware of Stevens & Lee performing any services for any such person or entity in connection with these cases, or having any relationship with any such person or entity, their attorneys or accountants that is adverse to the Debtors or the estates.

7. Furthermore, Stevens & Lee appears in cases, proceedings and transactions involving various attorneys, accountants, financial consultants and investment bankers, some of which now, or may in the future, represent themselves be claimants and parties in interest in these chapter 7 cases. From time to time, Stevens & Lee represents various attorneys, accountants, financial consultants and investment bankers, some of which now or may in the future, represent or be claimants or parties in interest in these chapter 7 cases. At this time, Stevens & Lee is not aware of such representations except as may be noted above.

8. Based upon the foregoing, and except as disclosed herein, Stevens & Lee is a “disinterested person” as that term is defined in 11 U.S.C. § 101(14) in that Stevens & Lee:

- a. is not a creditor, equity security holder, or insider of the Debtors;
- b. is not and was not, investment bankers for any outstanding security of the Debtors;
- c. has not been, within three (3) years before the date of the filing of the Debtors’ chapter 11 petitions (i) an investment banker of the Debtors, or (ii) an attorney for such an investment banker in connection with the offer, sale, or issuance of security of the Debtors;
- d. is not, and was not within two (2) years before the date of filing of the Debtors’ chapter 11 petitions, a director, officer, or employee of the Debtors; and
- e. does not have an interest materially adverse to the interest of the estate or of any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with, or interest in, the Debtors or any investment banker specified in subparagraph (b) of this paragraph, or for any other reason.

9. In addition, Stevens & Lee does not hold or represent any interest adverse to the Debtors’ estates, except as set forth herein.

10. Stevens & Lee intends to apply to the Court for interim and final allowance of compensation for professional services rendered and reimbursement of expenses incurred in accordance with Sections 330 and 331 of the Bankruptcy Code and the other applicable provisions

of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and such other procedures as may be fixed by orders entered by the Court.

11. Subject to Court approval in accordance with Section 330 of the Bankruptcy Code, compensation will be payable to Stevens & Lee at its normal and customary rates, plus reimbursement of actual, necessary expenses and other charges incurred. The principal attorneys presently designated to represent the Trustee and their current standard hourly rates are:

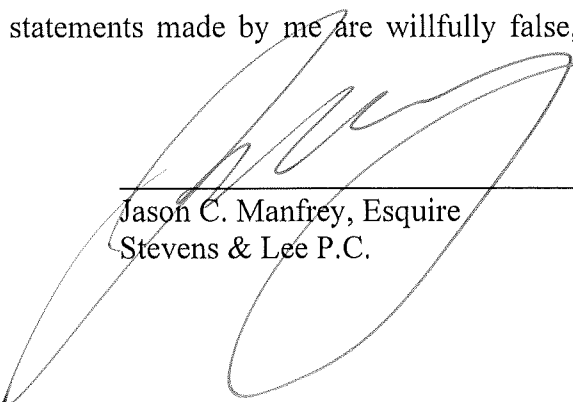
- a. Joseph Huston - \$ 1,020 per hour
- b. Jason Manfrey - \$760 per hour
- c. Constantine Pourakis - \$1,050 per hour

12. The hourly rates set forth above are Stevens & Lee's standard hourly rates for work of this nature. These rates are set at a level designed to fairly compensate Stevens & Lee for the work of its attorneys and to cover fixed and routine overhead expenses. These rates are subject to periodic adjustments to reflect economic and other conditions. Other attorneys may from time to time serve the Trustee in connection with the matters herein described.

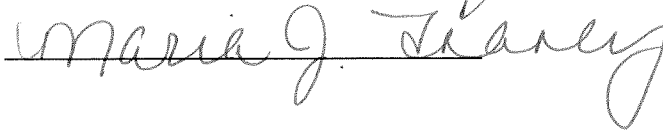
13. No promises have been rendered by or to Stevens & Lee as to compensation in connection with these cases other than in accordance with the provisions of the Bankruptcy Code. Stevens & Lee has no agreement with any other person (other than customary agreements among the partners of Stevens & Lee) for the sharing of compensation to be received by Stevens & Lee in connection with the services rendered in these cases.

14. To the extent that Stevens & Lee discovers any connection with any Interested Party or enters into any new relationship with any Interested Party, Stevens & Lee will promptly supplement its disclosure to the Court.

15. I declare under penalty that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

  
\_\_\_\_\_  
Jason C. Manfrey, Esquire  
Stevens & Lee P.C.

Sworn and ascribed to me on this  
13<sup>th</sup> day of March, 2025

  
\_\_\_\_\_  
Maria J. Franey

Commonwealth of Pennsylvania - Notary Seal  
Maria J. Franey, Notary Public  
Montgomery County  
My Commission Expires June 17, 2028  
Commission Number 1298724

**SCHEDULE A**

**POTENTIAL PARTIES IN INTEREST**

**Debtors**

Wynne Transportation Holdings, LLC (d/b/a U.S. Crew Change)  
Wynne Transportation, LLC (f/k/a Great Plains Crew Change)  
Coastal Crew Change Company, LLC  
WTH Commercial Services, LLC (d/b/a Mountain Crew Change)  
Southwest Crew Change Company, LLC  
Great Plains Crew Change Company, LLC  
Allegheny Crew Change Company, LLC

**Current and Former Directors and Officer**

Matt Keis  
John Montgomery  
Kelsey Broyles  
Matt Kahn

**Equity Security Holders**

Bedford Wynne  
Gemini Investors VI, L.P.

**Secured Lenders/Banks**

Prosperity Bank

**Chapter 7 Trustee**

Alfred T. Giuliano

**Chapter 7 Bankruptcy Professionals**

Stevens & Lee  
Giuliano Miller & Company

**Chapter 11 Bankruptcy Professionals**

Ankura Capital Advisors  
Ankura Consulting Group  
Landis Rath & Cobb, LLP  
Omni Agent Solutions, Inc.

**Benefit Providers**

Guardian Life Insurance Company Of America

Key Benefit Administrators  
Securian Financial  
Teladoc  
The Standard  
UnitedHealthcare  
Uprise Health (Guardian)  
Wex

**Current Customers**

SLCH Cheer  
St John Elementary  
Aimee Fontenot  
Alpine Transmission  
American Legion  
American Public Power Association  
Angela Dautriel  
Angela Redmon  
Astro Asia USA  
Astro Asia Tour  
Barbe High School  
Basion Radio Network  
Bauer Excavating  
Bell City HS  
Best Priced Firewood  
Bette Daspit  
Big Sky Linen & Uniform  
Boris KRG International  
Buffalo Pittsburgh Rail Road  
Butch Kaylor  
Butler City Fire Department  
Butler City Public Works  
Butler Township  
Cameron Walkup  
Casper Shrine Club  
Centerpoint Energy  
Chandalier Jones  
Chautauqua County DSS  
Chenault International Airport Authority  
Clay Courtier  
Clearfield Township  
Cletus Lee  
Coach USA  
Coach USA Erie  
Coach USA Lenzner  
Coach USA Wisconsin  
Coby Wallace



Cowboy Clean Fuel  
CPSB Houston Zoo  
CSE Federal Credit Union  
D Dewey  
Dalton Geibel  
Daniel Hillard  
Darrell Rimbey  
Dave Zanicky  
DeRidder High School  
Donegal Township  
Double EE Contractors, LLC  
Dumbaugh Electric  
E&E Developers  
E.K. Key Elementary  
Edison Chouest Offshore Companies  
Elizabeth Miller  
Emily Jones  
EMIT Technologies  
Energy Policy Network  
Etzel Masonry  
FK White Middle School  
FPC Lake Charles  
Gabrielle Moore  
Gillette College  
Great Plains Dispatch  
Grit & Gater  
Gulf Coast Marine Fabricators, LLC  
Habitat Recovery Non Profit  
Herman Vol Fire Dept  
Hiles Excavating  
Hixon Funeral Home  
Hixson-Snider Funeral Home  
Imperial Calcasieu Museum  
Jamie Snook  
Jasmine Harris  
JC Lyons  
Jennifer Constantin  
John J Johnson Elementary  
Keith Irons  
Kelly Clark  
Kelsie Bergbigler  
KGHL  
King Ranch  
Kortney Simmers  
Lake Arthur High  
Larry Grabe

Lenzner Tours  
Lone Pine Bus Lines, Inc  
Lou Etzel  
Lower Colorado River Authority  
Lucas Barrow  
Mackenzie Brown  
Maxie Shelvin  
McNeese State University  
Mike Albert  
Mindya Biness Tours  
Moose Lodge  
MV Transit  
Neil Walker  
New Years Eve Buck & Ball  
NTEC – Antelope Mine  
NY State Department of Transportation  
Oakland Township  
O'Donnel Transport  
Oneida Valley  
OSG Materials  
Peabody Powder River  
PFS Group  
Ray Riso  
Reeves Temple  
Ritenour Lawn Care  
Rob Acord  
Roy Hoffman  
Saint Vincent Depaul  
Sasol North American Operations  
SBRD2  
Southern Devall  
St. John Elementary  
Stillwater East Boulder  
Stillwater Nye Contract  
Sulphur High School  
Summit Township  
Swank  
SWLA Charter Academy  
T A Nelson  
Tamara Grimm  
Tamburitzans  
Teresa Ernst  
TGS  
Tom Jacues  
Trinity Tour Travels  
Tyler Miller

USPFO Montana J4  
Venango Township  
Vessel Project of Louisiana  
WC Rasely  
Welsch High School  
Western Heights Elementary  
Westmoreland Transit  
Whiting-Turner/P.J. Dick, JV  
Wyoming Machinery  
Yates

**Insurance Companies/Brokers/Premium Financier**

AFCO Credit Corporation  
Argonaut Insurance Company  
Axis Surplus Insurance Company  
Carolina Casualty Insurance Company  
Lexington Insurance Company  
McGriff, Seibels & Williams, Inc.  
RSUI Indemnity Company  
State of Wyoming Department of Workforce Services  
Texas Mutual Insurance Company

**Landlords**

4W Properties  
Anthony L. Brinkoetter  
Beartooth Industries  
Bob Kaylor  
Coach Properties  
Coach Properties-1  
Coach Properties-2  
Coach Properties-3  
Coach Properties-4  
Coach Properties-5  
Coach Properties-6  
Columbus 1 Re2, LLC  
Cook Properties  
Dallas Parkway Plaza, LLC  
Gasstop Two  
HDDA- Billings, LLC  
HRT Rentals  
Kidwell Center  
Kristy M. Lewis  
Livingston Landlady  
Lone Tree Village 108  
Lone Tree Village 24

Montana Works  
Nathan A. Beck  
North Platte Agency, LLC  
Oakland Land Development  
Park County Fair  
RB Payson  
Salvador Properties, LLC  
Schon, LLC  
St Mary's Catholic Church  
Susan Carter  
Svjetlana T. Beck  
Tom Kaylor  
Top Hat Storage  
William G. Kaylor John

**Lienholders**

Auxilior Capital Partners, Inc  
Bridgestone Americas  
Gram Sigma  
Pathward, National Association  
Prosperity Bank

**Litigation Parties**

City of Chicago  
Damonica Jones  
Eugenia Dickerson  
Fred Wherland  
GETZ Transport Solutions, LLC  
John Tate  
Justin Craig Fernandez  
Keisha Sonnier  
Maurice O'Brien  
Patricia Thomas  
Tracy M. Hearn

**Regulatory and Government**

City of Dallas  
City of Houston Municipal Courts  
City of Irving – Municipal Services  
City of Orange  
Office of Labor Commissioner  
United States Treasury

**Significant Vendors**

Aim Technologies  
Chacon's Design Studio  
Distinctive Systems Inc  
Electronic Funds Source, LLC  
KBA Self Funded  
Paycom Payroll, LLC  
T-Chek  
Texas Department of Motor Vehicles  
Texas Mutual  
Tradition Equipment, LLC  
Trans Lease, Inc  
Whitley Penn

**Taxing Authorities**

Alabama Department of Revenue  
Arizona Department of Revenue  
Arkansas Department of Finance and Administration  
California Department of Revenue  
California Employment Development Department  
Colorado Employment Development Department  
Columbus Income Tax Division  
Comptroller of Maryland  
Dallas County Tax Office – John R. Ames, CTA  
Florida Employment Development Department  
Georgia Employment Development Department  
Idaho State Tax Commission  
Illinois Department of Revenue  
Internal Revenue Service  
Louisiana Department of Revenue  
Mississippi Department of Revenue  
Montana Department of Revenue  
New Jersey Department of the Treasury  
New Mexico Taxation and Revenue  
New Mexico Taxation and Revenue Department  
New York Department of Taxation and Finance  
North Carolina Department of Revenue  
Ohio Department of Job and Family Resources  
Ohio Department of Taxation  
Oregon Department of Revenue  
Pennsylvania Department of Revenue  
South Dakota Department of Revenue  
State of California Franchise Tax Board  
Tennessee Department of Revenue  
Texas Comptroller of Public Accounts

The City of Columbus Income Tax Division  
Utah Department of Revenue  
Washington Department of Revenue  
West Virginia Tax Division  
Wisconsin Department of Revenue  
Wyoming Virginia Tax Division

**Unions**

AFL-CIO, Eastern States Joint Board, Local 298  
AFL-CIO, ESJB Amalgamated Local 1931  
Building Material and Construction Drivers, Helpers and Material Handlers, Teamsters Local  
No. 341

**United States Trustee, Judges and Court Contacts for the District of Delaware**

**US Trustee and Staff:**

Attix, Lauren  
Bates, Malcolm  
Bu, Fang  
Casey, Linda  
Cudia, Joseph  
Dice, Holly  
Dortch, Shakima L.  
Fox, Timothy J. Jr.  
Giordano, Diane  
Girello, Michael  
Green, Christine  
Hackman, Benjamin  
Jones, Nyanquoi  
Konde, Hawa  
Leamy, Jane  
Lipshie, Jonathan  
McCollum, Hannah M.  
McMahon, Joseph  
Nyaku, Jonathan  
O'Malley, James R.  
Richenderfer, Linda  
Schepacarter, Richard  
Serrano, Edith A.  
Sierra-Fox, Rosa  
Thomas, Elizabeth  
Wynn, Dion

**Judges and Staff:**

Barksdale, Nickita  
Batts, Cacia

Bello, Rachel  
Brady, Claire  
Capp, Laurie  
Cayello, Robert  
Farrell, Catherine  
Gadson, Danielle  
Haney, Laura  
Honorable Ashley M. Chan  
Honorable Brendan Linehan Shannon  
Honorable Craig T. Goldblatt  
Honorable J. Kate Stickles  
Honorable John T. Dorsey  
Honorable Karen B. Owens  
Honorable Laurie Selber Silverstein  
Honorable Mary F. Walrath  
Honorable Thomas M. Horan  
Hrycak, Amanda  
Johnson, Lora  
Lopez, Marquietta  
Lugano, Al  
O'Boyle, Una  
Ranieri, Joan  
Subda, Paula  
Szymanski, Cheryl  
Walker, Jill  
Washington, Nikki  
Yeager, Demitrai

**Unsecured Trade/Vendors/Other**

ABC Bus, Inc.  
ABC Companies  
Andrews Myers, P.C.  
Ascentium Capital, LLC  
AWSI DBA Disa, Inc.  
Bridgestone Americas, Inc.  
Chacon's Design Studio  
Dallas Parkway Plaza, LLC  
DATTCO, Inc.  
Doyle's Diesel & Sons, Inc.  
El Paso United Charters, LLC  
Electronic Funds Source  
Electronic Funds Source, LLC  
Esbrook Law PC  
Game Time Transportation, LLC  
HotelEngine, Inc.  
Hovis Auto Truck & Supply

Inter-State Oil Co.  
Interstate Power Systems, Inc. – Gillette  
I-State Truck Centers  
Joelita Bufete  
KBA Self Funded  
Kelly Hart & Hallman, LLP  
Kenworth of Louisiana, LLC  
Kenworth Sales Company  
Lily's Bus Line, Inc.  
Lindeman Esq  
Master's Leasing & Rental  
Mayo Tours, Inc.  
Motive Technologies, Inc.  
NAPA Auto Parts  
NFI Aftermarket Parts  
NFI Parts The Aftermarket Parts Company, LLC  
Northern Desert Mechanical, LLC  
Oakland Land & Development, LLC  
OK Tours, LLC  
PB Minn Leasing, LLC  
PB Roch Leasing, LLC  
Proskauer Rose, LLP  
RB Payson, LLC  
River Bluff Motorcoach, Inc.  
Ron Turley Associates, Inc.  
Rush Truck Centers of Idaho, Inc.  
Samsara  
Signal 88, LLC  
Smith Power Product, Inc.  
Splash Truck And Auto Wash, LLC  
Standard Retirement Services, Inc.  
Stinson, LLP  
Sumitomo Mitsui Finance & Leasing Co, LTD  
Sweet Grass Portables, LLC  
T-Chek  
Tems North America, Inc.  
Texas Department of Motor Vehicles  
Thomas Edwards Group, Inc.  
Titus Leasing Company  
Tradition Equipment, LLC  
Trans Lease, Inc.  
Western Motorcoach  
Windels Marx Lane & Mittendorf, LLP  
Windstar Lines  
Wurth USA, Inc.



**Utilities Providers**

AT&T Mobility  
Black Hills Energy  
Butler Area Sewer Authority  
Calcasieu Water  
CC Communications  
Center Point Energy  
Century Link  
City of Douglas  
City of Gillette  
City of Livingston Utility  
Desert Disposal  
Elko Broadcasting Company, Inc.  
Elko Sanitation  
Entergy  
Montana Dakota Utilities Co.  
Northwestern Energy  
NV Energy  
Optinum Business  
Payson Utah Electric  
Pennsylvania American Water  
Peoples Gas  
Rev Business  
RL Frank Septic  
Rocky Mountain Power  
Simple Fiber Communications  
Spectrum Enterprises  
Verizon  
Verizon Business  
Waste Connections of Wyoming  
Waste Management  
Waste Management National Services  
Waste Management of Texas Inc.  
WestPenn Power